UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JING ZHANG, WEI FAN, MINGLIAN ZHANG, AND JUN ZHOU,)
Plaintiffs v.) 21-cv-01625 (GHW)(BCM)
XUEYUAN HAN, HANFOR HOLDINGS CO., LTD., HF HOLDINGS LIMITED., HANFOR CAPITAL MANAGEMENT CO., LTD., NUOYUAN CAPITALMANAGEMENT COMPANY LTD., GEORGE XU, JUNJUN FENG, WENNAN AO, BZ INDUSTRIAL (CHINA), BZ INDUSTRIAL (VIRGIN ISLANDS), BZ INDUSTRIAL (CAYMAN ISLANDS), HANFOR (CAYMAN) LIMITED, HFRE LLC, HF CAPITAL MANAGEMENT CAY INC., HF COSMOPOLITAN BETA L.P., HENGTAI SECURITIES CO., LTD., JOHN DOES 1-10, JANE DOES 1-10, AND ABC-XYZ CORP. 1-10,	DECLARATION OF GEORGE XU IN OPPOSITION TO PLAINTIFFS' APPLICATION FOR AN ATTACHMENT))))))

George Xu hereby declares pursuant to 28 U.S.C. § 1746:

- 1. I am a defendant in this action. I submit this declaration in opposition to the plaintiffs' order to show cause seeking an attachment against the defendants. This declaration is based on my personal knowledge.
- 2. I am an accountant. In November 2018, I began doing work for Xuanhuan Han and several companies in which he has an interest. I did not do any work for Mr. Han or any of the defendants prior to November 2018.
- 3. Except as described below, the work I have done for Mr. Han relates entirely to preparing U.S. tax returns and related tax issues. I have never been involved in transferring

funds or assets for Mr. Han or any of the other defendants.

- 4. I do not have (and have never had) a direct or indirect ownership interest in Hanfor Holdings Co., Ltd., HF Holdings Limited, Hanfor Capital Management Co., Ltd., Nuoyuan Capital Management Company Ltd., BZ Industrial (CHINA), BZ Industrial (Virgin Islands), BZ Industrial (Cayman Islands), Hanfor (Cayman) Limited, HFRE LLC, HF Capital Management Cay Inc., HF Cosmopolitan Beta L.P., or Hengtai Securities Co., Ltd. (collectively, the "Corporate Defendants").
- I am not (and have never been) a director, manager or general partner of any of the Corporate Defendants.
- 6. I am not (and have never been) an officer or employee of any of the Corporate Defendants.
- 7. I do not have direct access to bank accounts of any of the Corporate Defendants or of Mr. Han.
- 8. In 2020, I filed applications for authorization to do business in New York for Corporate Defendants HF Capital Management Cay, Inc., BZ Industrial Limited, and HF Cosmopolitan Beta, L.P. As noted above, I am not an officer, director, employee or agent for any of those companies and I am not authorized to accept service of process (or take any other actions) on their behalf.
 - 9. I have not entered into any contracts with any of the plaintiffs.
 - 10. I have not had any direct communications with any of the plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 0, 2021